

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T5-15-23)

The United States Postal Service hereby provides responses of witness Plunkett to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T5-15-16, filed on July 30, 1998, and OCA/USPS-T5-17-23, filed on July 31, 1998.

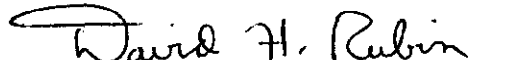
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

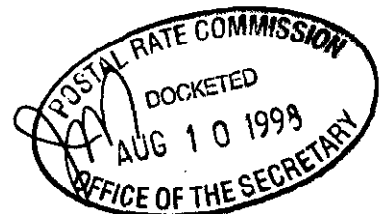
UNITED STATES POSTAL SERVICE

By its attorneys:

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August 10, 1998



**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-15. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that you assumed all "Letter Size Pieces" (260,096,523) and all "Flat Size Pieces" (35,528,936) will be mailed in envelopes. If you do not confirm, please explain.
- b. Please explain the difference between the "Total Envelopes" of 295,635,459 (260,096,523+35,528,936) and the "Total Pieces" of 295,665,025 in USPS-T-2, Exhibit A, Table 4, line (1).

OCA/USPS-T5-15 Response.

a-b. Confirmed that I assumed all pieces will be mailed in envelopes. However, the number of letter size pieces should be 250,313,062 and the number of flat size pieces should be 45,351,960. See my revised Exhibit B, which is attached to my response to OCA-T5-16.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-16. Please refer to USPS-T-5, Exhibit B, page 1.

- a. For 1999, please confirm that the figure \$39,648,674, "Impression Costs," was derived from the following formula:

=+'A:\Mailing Online\[pwmod3.xls]Impression Costs'!D\$36-'A:\Mailing Online\[pwmod3.xls]Impression Costs'!D\$13-'A:\Mailing Online\[pwmod3.xls]Impression Costs'!D\$23-'A:\Mailing Online\[pwmod3.xls]Impression Costs'!D\$33

If you do not confirm, please explain.

- b. Please confirm that the formula in part (a) of this interrogatory refers to the file "pwmod3.xls" that is located on a 3.5 inch diskette and can be accessed only from the A:drive of a computer. If you do not confirm, please explain.
- c. For 1999, please confirm that the figure 974,425,779, "Pages printed on 8.5x11 paper," was derived from the following formula:

=+'A:\Mailing Online\[MOL7_13.xls]Volumes'!D\$57+'A:\Mailing Online\[MOL7_13.xls]Volumes'!D\$90

If you do not confirm, please explain.

- d. Please confirm that the formula in part (c) of this interrogatory refers to the file "MOL7_13.xls" that is located on a 3.5 inch diskette and can be accessed only from the A: drive of a computer. If you do not confirm, please explain.
- e. Please confirm that the figure \$44,258, transportation costs for "First-Class letters," is derived from the following formula:

=+D17*A:\Mailing Online\[pwmod3.xls]Transportation Costs'!E\$186*'P:\PRICING\MIOOnline\[RSRCHVOL.xls]1999 projections'!B\$6/'P:\PRICING\MIOOnline\[RSRCHVOL.XLS]1999 projections'!B\$5

If you do not confirm, please explain.

- f. Please confirm that the formula in part (e) of this interrogatory refers to the file "RSRCHVOL.XLS," that is located on the p:drive of a computer. If you do not confirm, please explain.
- g. Please provide electronic versions of your exhibits (i.e., Excel files) that contain the cell formulas referencing files on the A:drive only.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

- h. Please provide a 3.5 inch diskette containing all files referenced in the Excel spreadsheets requested in part (g) of this interrogatory.

OCA/USPS-T5-16 Response.

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. Confirmed.
- e. Confirmed.
- f. Confirmed.

g-h. The formulas referred to in parts (a), (c), and (e) of this interrogatory referenced a preliminary version of witness Seckar's Exhibit A and witness Rothschild's library reference. My revised Exhibit B (filed August 10) references the final version of witness Seckar's Exhibit A and corrects inadvertent errors in my Exhibit B. The revised Exhibit B, along with documentation, is attached , and is being provided on a 3.5 inch diskette as library reference MC98-1/8.

Revenues Including Variable Information Systems Costs

	1999	2000	2001	2002	2003	Total 1999-2000
Impression Costs	42,978,544	73,961,247	112,124,418	153,987,653	184,275,480	\$ 116,939,790
Paper Costs						
Pages printed on 8.5x11 paper	974,425,778	1,700,634,620	2,651,498,717	3,716,985,760	4,341,778,237	2,675,060,398
Cost	\$ 4,762,993	\$ 8,578,708	\$ 13,696,269	\$ 19,680,024	\$ 23,562,763	\$ 13,341,702
Pages printed on 8.5x14 paper	108,818,496	189,917,493	296,104,750	415,092,464	484,865,842	298,735,989
Cost	\$ 580,568	\$ 1,045,672	\$ 1,669,459	\$ 2,398,828	\$ 2,872,101	\$ 1,626,240
Pages printed on 11x17 paper	152,049,453	265,367,121	413,740,007	579,998,665	677,491,318	417,416,574
Cost	\$ 1,552,851	\$ 2,796,866	\$ 4,465,314	\$ 6,416,162	\$ 7,682,029	\$ 4,349,717
Total Pages	1,235,293,727	2,155,919,234	3,361,343,474	4,712,076,889	5,504,135,397	3,391,212,961
Total Paper Cost	6,896,412	12,421,246	19,831,042	28,495,014	34,116,893	19,317,658
Envelope Costs						
Letter Size Pieces	250,313,062	436,863,503	681,123,977	954,829,097	1,115,327,435	687,176,565
Cost	\$ 6,820,530	\$ 12,284,574	\$ 19,612,839	\$ 28,181,480	\$ 33,741,501	\$ 19,105,104
Flat Size Pieces	45,351,960	79,151,348	123,406,696	172,996,852	202,076,094	124,503,308
Cost	\$ 2,122,000	\$ 3,821,971	\$ 6,101,937	\$ 8,767,808	\$ 10,497,640	\$ 5,943,971
Total Envelopes	295,665,022	516,014,851	804,530,673	1,127,825,949	1,317,403,529	811,679,873
Total Cost	\$ 8,942,530	\$ 16,106,544	\$ 25,714,775	\$ 36,949,288	\$ 44,239,141	\$ 25,049,075
Subtotal Paper & Envelope Co	\$ 15,838,943	\$ 28,527,790	\$ 45,545,817	\$ 65,444,302	\$ 78,356,034	\$ 44,366,733
Transportation Costs						
First-Class letters	\$ 42,594	\$ 73,423	\$ 109,487	\$ 111,020	\$ 112,574	\$ 116,017
First-Class flats	\$ 11,717	\$ 20,198	\$ 30,118	\$ 30,540	\$ 30,968	\$ 31,915
Standard (A) letters	\$ 207,925	\$ 358,421	\$ 534,470	\$ 541,952	\$ 549,540	\$ 566,347
Standard (A) flats	\$ 496,104	\$ 855,185	\$ 1,275,231	\$ 1,293,084	\$ 1,311,188	\$ 1,351,289
Subtotal Transportation Costs	\$ 758,340	\$ 1,307,227	\$ 1,949,306	\$ 1,976,596	\$ 2,004,269	\$ 2,065,567
Total Costs	\$ 59,575,827	\$ 103,796,264	\$ 159,619,541	\$ 221,408,551	\$ 264,635,782	\$ 163,372,091
Revenue @ 25% Markup	\$ 74,469,783	\$ 129,745,330	\$ 199,524,426	\$ 276,760,689	\$ 330,794,727	\$ 204,215,113

Revenues Excluding Variable Information Systems Costs

	1999	2000	2001	2002	2003	Total 1999-2000
Impression Costs less USPS Variable Costs	41,419,920	71,928,732	109,451,834	151,488,535	181,777,811	\$ 113,348,651
Paper Costs						
Pages printed on 8.5x11 paper	974,425,778	1,700,634,620	2,651,498,717	3,716,985,760	4,341,778,237	2,675,060,398
Cost	\$ 4,762,993	\$ 8,578,708	\$ 13,696,269	\$ 19,680,024	\$ 23,562,763	\$ 13,341,702
Pages printed on 8.5x14 paper	108,818,496	189,917,493	296,104,750	415,092,464	484,865,842	298,735,989
Cost	\$ 580,568	\$ 1,045,672	\$ 1,669,459	\$ 2,398,828	\$ 2,872,101	\$ 1,626,240
Pages printed on 11x17 paper	152,049,453	265,367,121	413,740,007	579,998,665	677,491,318	417,416,574
Cost	\$ 1,552,851	\$ 2,796,866	\$ 4,465,314	\$ 6,416,162	\$ 7,682,029	\$ 4,349,717
Total Pages	1,235,293,727	2,155,919,234	3,361,343,474	4,712,076,889	5,504,135,397	3,391,212,961
Total Paper Cost	6,896,412	12,421,246	19,831,042	28,495,014	34,116,893	19,317,658
Envelope Costs						
Letter Size Pieces	250,313,062	436,863,503	681,123,977	954,829,097	1,115,327,435	687,176,565
Cost	\$ 6,820,530	\$ 12,284,574	\$ 19,612,839	\$ 28,181,480	\$ 33,741,501	\$ 19,105,104
Flat Size Pieces	45,351,960	79,151,348	123,406,696	172,996,852	202,076,094	124,503,308
Cost	\$ 2,122,000	\$ 3,821,971	\$ 6,101,937	\$ 8,767,808	\$ 10,497,640	\$ 5,943,971
Total Envelopes	295,665,022	516,014,851	804,530,673	1,127,825,949	1,317,403,529	811,679,873
Total Cost	\$ 8,942,530	\$ 16,106,544	\$ 25,714,775	\$ 36,949,288	\$ 44,239,141	\$ 25,049,075
Subtotal Paper & Envelope Cost	\$ 15,838,943	\$ 28,527,790	\$ 45,545,817	\$ 65,444,302	\$ 78,356,034	\$ 44,366,733
Transportation Costs						
First-Class letters	\$ 42,594	\$ 73,423	\$ 109,487	\$ 111,020	\$ 112,574	\$ 116,017
First-Class flats	\$ 11,717	\$ 20,198	\$ 30,118	\$ 30,540	\$ 30,968	\$ 31,915
Standard (A) letters	\$ 207,925	\$ 358,421	\$ 534,470	\$ 541,952	\$ 549,540	\$ 566,347
Standard (A) flats	\$ 496,104	\$ 855,185	\$ 1,275,231	\$ 1,293,084	\$ 1,311,188	\$ 1,351,289
Subtotal Transportation Costs	\$ 758,340	\$ 1,307,227	\$ 1,949,306	\$ 1,976,596	\$ 2,004,269	\$ 2,065,567
Total Costs	\$ 58,017,203	\$ 101,763,749	\$ 156,946,957	\$ 218,909,433	\$ 262,138,113	\$ 159,780,952
Revenue @ 25% Markup	\$ 72,521,503	\$ 127,204,686	\$ 196,183,696	\$ 273,636,792	\$ 327,672,641	\$ 199,726,189

Revenues Including Variable Information Systems Costs

	Note	1999	2000	2001	2002	2003
<u>Impression Costs</u>						
(a) Total Impression Costs	USPS T-2A page 1 line 25 Rev. 7/23/98	\$ 43,810,410	\$ 75,413,077	\$ 112,124,418	\$ 153,987,653	\$ 184,275,480
(b) Fixed Info Systems Costs (BW, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 7 Rev 7/23/98	\$ 379,097	\$ 661,626	\$ -	\$ -	\$ -
(c) Fixed Info Systems Costs (BW, 11x17)	USPS T-2A page 1 line 15 Rev 7/23/98	\$ 106,424	\$ 185,738	\$ -	\$ -	\$ -
(d) Fixed Info Systems Costs (Spot Color, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 23 Rev 7/23/98	\$ 346,346	\$ 604,466	\$ -	\$ -	\$ -
(e) Total Impression Costs excl. fixed info systems costs	=(a) - (b) - (c) - (d)	\$ 42,978,544	\$ 73,961,247	\$ 112,124,418	\$ 153,987,653	\$ 184,275,480
<u>Paper Costs</u>						
(f) 8.5x11 B&W pages	USPS T-2A page 9 line 45	541,001,192	944,192,341	1,472,112,088	2,063,670,494	2,410,555,277
(g) 8.5x11 Spot Color pages	USPS T-2A page 10 line 71	433,424,586	756,442,279	1,179,386,629	1,653,315,266	1,931,222,960
(h) Pages printed on 8.5x11 paper	=(f) + (g)	974,425,778	1,700,634,620	2,651,498,717	3,716,985,760	4,341,778,237
(i) 8.5x11 paper - Price per piece	USPS T-2A page 28	\$ 0.0049	\$ 0.0050	\$ 0.0052	\$ 0.0053	\$ 0.0054
(j) 8.5x11 paper - Total cost	=(h) * (i)	\$ 4,762,993	\$ 8,578,708	\$ 13,696,269	\$ 19,680,024	\$ 23,562,763
(k) 8.5x14 B&W pages	USPS T-2A page 9 line 49	60,416,029	105,442,192	164,397,357	230,459,336	269,197,515
(l) 8.5x14 Spot Color pages	USPS T-2A page 10 line 75	48,402,467	84,475,301	131,707,393	184,633,128	215,668,327
(m) Pages printed on 8.5x14 paper	=(k) + (l)	108,818,496	189,917,493	296,104,750	415,092,464	484,865,842
(n) 8.5x14 paper - Price per piece	USPS T-2A page 28	\$ 0.0053	\$ 0.0055	\$ 0.0056	\$ 0.0058	\$ 0.0059
(o) 8.5x14 paper - Total cost	=(m) * (n)	\$ 580,568	\$ 1,045,672	\$ 1,669,459	\$ 2,398,828	\$ 2,872,101
(p) 11x17 B&W pages	USPS T-2A page 9 line 53	84,417,856	147,331,826	229,708,452	322,015,259	376,143,180
(q) 11x17 Spot Color pages	USPS T-2A page 10 line 79	67,631,597	118,035,295	184,031,555	257,983,406	301,348,138
(r) Pages printed on 11x17 paper	=(p) + (q)	152,049,453	265,367,121	413,740,007	579,998,665	677,491,318
(s) 11x17 paper - Price per piece	USPS T-2A page 28	\$ 0.0102	\$ 0.0105	\$ 0.0108	\$ 0.0111	\$ 0.0113
(t) 11x17 paper - Total cost	=(r) * (s)	\$ 1,552,851	\$ 2,796,866	\$ 4,465,314	\$ 6,416,162	\$ 7,682,029
(u) Total Pages	=(h) + (m) + (r)	1,235,293,727	2,155,919,234	3,361,343,474	4,712,076,889	5,504,135,397
(v) Total Paper Cost	=(j) + (o) + (t)	\$ 6,896,412	\$ 12,421,246	\$ 19,831,042	\$ 28,495,014	\$ 34,116,893
<u>Envelope Costs</u>						
(w) First-Class Letters	USPS T-2A page 6 line 92	77,672,143	135,558,745	211,352,770	296,283,469	346,086,103
(x) Standard Mail (A) Letters	USPS T-2A page 6 line 94	172,640,919	301,304,758	469,771,207	658,545,628	769,241,332
(y) Total letter size pieces	=(w) + (x)	250,313,062	436,863,503	681,123,977	954,829,097	1,115,327,435
(z) # 10 Envelope no window and logo - Price per piece	USPS T-2A page 28	\$ 0.0272	\$ 0.0281	\$ 0.0288	\$ 0.0295	\$ 0.0303
(aa) Envelope Costs - letter size pieces	=(y) * (z)	\$ 6,820,530	\$ 12,284,574	\$ 19,612,839	\$ 28,181,480	\$ 33,741,501
(bb) First-Class flats	USPS T-2A page 6 line 93	14,072,713	24,560,663	38,293,098	53,680,923	62,704,212
(cc) Standard Mail (A) flats	USPS T-2A page 6 line 95	31,279,247	54,590,685	85,113,598	119,315,929	139,371,882
(dd) Total flat size pieces	=(bb) + (cc)	45,351,960	79,151,348	123,406,696	172,996,852	202,076,094
(ee) Flat sized envelope no window and no logo - Price per piece	USPS T-2A page 28	\$ 0.0468	\$ 0.0483	\$ 0.0494	\$ 0.0507	\$ 0.0519
(ff) Envelope Costs - flat size pieces	=(dd) * (ee)	\$ 2,122,000	\$ 3,821,971	\$ 6,101,937	\$ 8,767,808	\$ 10,497,640
(gg) Total Envelopes	=(y) + (dd)	295,665,022	516,014,851	804,530,673	1,127,825,949	1,317,403,529
(hh) Total Envelope Cost	=(aa) + (ff)	\$ 8,942,530	\$ 16,106,544	\$ 25,714,775	\$ 36,949,288	\$ 44,239,141

(continued)

<u>Transportation Costs</u>							
(ii) First-Class Letters	USPS T-2A page 6 line 92	77,672,143	135,558,745	211,352,770	296,283,469	346,086,103	
(jj) First-Class Letters - Transportation cost per piece	USPS T-2A page 7 line 140	\$ 0.00055	\$ 0.00054	\$ 0.00052	\$ 0.00037	\$ 0.00033	
(kk) Total First-Class letter transportation costs	=(ii) * (jj)	\$ 42,594	\$ 73,423	\$ 109,487	\$ 111,020	\$ 112,574	
 (ll) First-Class flats		USPS T-2A page 6 line 93	14,072,713	24,560,663	38,293,098	53,680,923	62,704,212
(mm) First-Class flats - Transportation cost per piece	USPS T-2A page 7 line 141	\$ 0.00083	\$ 0.00082	\$ 0.00079	\$ 0.00057	\$ 0.00049	
(nn) Total First-Class flats letter transportation costs	=(ll) * (mm)	\$ 11,717	\$ 20,198	\$ 30,118	\$ 30,540	\$ 30,968	
 (oo) Standard Mail (A) Letters		USPS T-2A page 6 line 94	172,640,919	301,304,758	469,771,207	658,545,628	769,241,332
(pp) Standard Mail (A) Letters - Transportation cost per piece	USPS T-2A page 7 line 142	\$ 0.00120	\$ 0.00119	\$ 0.00114	\$ 0.00082	\$ 0.00071	
(qq) Total Standard Mail (A) letter transportation costs	=(oo) * (pp)	\$ 207,925	\$ 358,421	\$ 534,470	\$ 541,952	\$ 549,540	
 (rr) Standard Mail (A) flats		USPS T-2A page 6 line 95	31,279,247	54,590,685	85,113,598	119,315,929	139,371,882
(ss) Standard Mail (A) flats - Transportation cost per piece	USPS T-2A page 7 line 143	\$ 0.01586	\$ 0.01567	\$ 0.01498	\$ 0.01084	\$ 0.00941	
(tt) Total Standard Mail (A) flat transportation costs	=(rr) * (ss)	\$ 496,104	\$ 855,185	\$ 1,275,231	\$ 1,293,084	\$ 1,311,188	
(uu) <u>Total Transportation Costs</u>	=(kk) + (nn) + (qq) + (tt)	\$ 758,340	\$ 1,307,227	\$ 1,949,306	\$ 1,976,596	\$ 2,004,269	
(vv) <u>Total Printing and Transportation Costs</u>	=(e) + (v) + (hh) + (uu)	\$ 59,575,827	\$ 103,796,264	\$ 159,619,541	\$ 221,408,551	\$ 264,635,782	
(xx) 25% Markup on printing and transportation costs	=(vv) * 25%	\$ 14,893,957	\$ 25,949,066	\$ 39,904,885	\$ 55,352,138	\$ 66,158,945	
(yy) <u>Total Revenue including Markup</u>	=(vv) + (xx)	\$ 74,469,783	\$ 129,745,330	\$ 199,524,426	\$ 276,760,689	\$ 330,794,727	

Revenues Including Variable Information Systems Costs

	Note	1999	2000	2001	2002	2003
Impression Costs						
(a) Total Impression Costs	USPS T-2A page 1 line 25 Rev. 7/23/98	\$ 43,810,410	\$ 75,413,077	\$ 112,124,418	\$ 153,987,653	\$ 184,275,480
(b) Fixed Info Systems Costs (BW, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 7 Rev 7/23/98	\$ 379,097	\$ 661,626	\$ -	\$ -	\$ -
(c) Fixed Info Systems Costs (BW, 11x17)	USPS T-2A page 1 line 15 Rev 7/23/98	\$ 106,424	\$ 185,738	\$ -	\$ -	\$ -
(d) Fixed Info Systems Costs (Spot Color, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 23 Rev 7/23/98	\$ 346,346	\$ 604,466	\$ -	\$ -	\$ -
(e) Variable Info Systems Costs (BW, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 6 Rev 7/23/98	\$ 710,294	\$ 926,255	\$ 1,217,946	\$ 1,138,895	\$ 1,138,234
(f) Variable Info Systems Costs (BW, 11x17)	USPS T-2A page 1 line 14 Rev 7/23/98	\$ 199,401	\$ 260,027	\$ 341,914	\$ 319,722	\$ 319,536
(g) Variable Info Systems Costs (Spot Color, 8.5x11 & 8.5x14)	USPS T-2A page 1 line 22 Rev 7/23/98	\$ 648,929	\$ 846,233	\$ 1,112,724	\$ 1,040,502	\$ 1,039,898
(h) Total Impression Costs excl. info systems costs	=(a) - (b) - (c) - (d) - (e) - (f) - (g)	\$ 41,419,920	\$ 71,928,732	\$ 109,451,834	\$ 151,488,535	\$ 181,777,811
Paper Costs						
(i) 8.5x11 B&W pages	USPS T-2A page 9 line 45	541,001,192	944,192,341	1,472,112,088	2,063,670,494	2,410,555,277
(j) 8.5x11 Spot Color pages	USPS T-2A page 10 line 71	433,424,586	756,442,279	1,179,386,629	1,653,315,266	1,931,222,960
(k) Pages printed on 8.5x11 paper	=(i) + (j)	974,425,778	1,700,634,620	2,651,498,717	3,716,985,760	4,341,778,237
(l) 8.5x11 paper - Price per piece	USPS T-2A page 28	\$ 0.0049	\$ 0.0050	\$ 0.0052	\$ 0.0053	\$ 0.0054
(m) 8.5x11 paper - Total cost	=(k) * (l)	\$ 4,762,993	\$ 8,578,708	\$ 13,696,269	\$ 19,680,024	\$ 23,562,763
(n) 8.5x14 B&W pages	USPS T-2A page 9 line 49	60,416,029	105,442,192	164,397,357	230,459,336	269,197,515
(o) 8.5x14 Spot Color pages	USPS T-2A page 10 line 75	48,402,467	84,475,301	131,707,393	184,633,128	215,668,327
(p) Pages printed on 8.5x14 paper	=(n) + (o)	108,818,496	189,917,493	296,104,750	415,092,464	484,865,842
(q) 8.5x14 paper - Price per piece	USPS T-2A page 28	\$ 0.0053	\$ 0.0055	\$ 0.0056	\$ 0.0058	\$ 0.0059
(r) 8.5x14 paper - Total cost	=(p) * (q)	\$ 580,568	\$ 1,045,672	\$ 1,669,459	\$ 2,398,828	\$ 2,872,101
(s) 11x17 B&W pages	USPS T-2A page 9 line 53	84,417,856	147,331,826	229,708,452	322,015,259	376,143,180
(t) 11x17 Spot Color pages	USPS T-2A page 10 line 79	67,631,597	118,035,295	184,031,555	257,983,406	301,348,138
(u) Pages printed on 11x17 paper	=(s) + (t)	152,049,453	265,367,121	413,740,007	579,998,665	677,491,318
(v) 11x17 paper - Price per piece	USPS T-2A page 28	\$ 0.0102	\$ 0.0105	\$ 0.0108	\$ 0.0111	\$ 0.0113
(w) 11x17 paper - Total cost	=(u) * (v)	\$ 1,552,851	\$ 2,796,866	\$ 4,465,314	\$ 6,416,162	\$ 7,682,029
(x) Total Pages	=(k) + (p) + (u)	1,235,293,727	2,155,919,234	3,361,343,474	4,712,076,889	5,504,135,397
(y) Total Paper Cost	=(m) + (r) + (w)	\$ 6,896,412	\$ 12,421,246	\$ 19,831,042	\$ 28,495,014	\$ 34,116,893
Envelope Costs						
(z) First-Class Letters	USPS T-2A page 6 line 92	77,672,143	135,558,745	211,352,770	296,283,469	346,086,103
(aa) Standard Mail (A) Letters	USPS T-2A page 6 line 94	172,640,919	301,304,758	469,771,207	658,545,628	769,241,332
(bb) Total letter size pieces	=(z) + (aa)	250,313,062	436,863,503	681,123,977	954,829,097	1,115,327,435
(cc) # 10 Envelope no window and logo - Price per piece	USPS T-2A page 28	\$ 0.0272	\$ 0.0281	\$ 0.0288	\$ 0.0295	\$ 0.0303
(dd) Envelope Costs - letter size pieces	=(bb) * (cc)	\$ 6,820,530	\$ 12,284,574	\$ 19,612,839	\$ 28,181,480	\$ 33,741,501
(ee) First-Class flats	USPS T-2A page 6 line 93	14,072,713	24,560,663	38,293,098	53,680,923	62,704,212
(ff) Standard Mail (A) flats	USPS T-2A page 6 line 95	31,279,247	54,590,685	85,113,598	119,315,929	139,371,882
(gg) Total flat size pieces	=(ee) + (ff)	45,351,960	79,151,348	123,406,696	172,996,852	202,076,094
(hh) Flat sized envelope no window and no logo - Price per piece	USPS T-2A page 28	\$ 0.0468	\$ 0.0483	\$ 0.0494	\$ 0.0507	\$ 0.0519
(ii) Envelope Costs - flat size pieces	=(gg) * (hh)	\$ 2,122,000	\$ 3,821,971	\$ 6,101,937	\$ 8,767,808	\$ 10,497,640
(jj) Total Envelopes	=(bb) + (gg)	295,665,022	516,014,851	804,530,673	1,127,825,949	1,317,403,529
(kk) Total Envelope Cost	=(dd) + (ii)	\$ 8,942,530	\$ 16,106,544	\$ 25,714,775	\$ 36,949,288	\$ 44,239,141

(continued)

<u>Transportation Costs</u>							
(ll) First-Class Letters	USPS T-2A page 6 line 92	77,672,143	135,558,745	211,352,770	296,283,469	346,086,103	
(mm) First-Class Letters - Transportation cost per piece	USPS T-2A page 7 line 140	\$ 0.00055	\$ 0.00054	\$ 0.00052	\$ 0.00037	\$ 0.00033	
(nn) Total First-Class letter transportation costs	=(ll) * (mm)	\$ 42,594	\$ 73,423	\$ 109,487	\$ 111,020	\$ 112,574	
(oo) First-Class flats	USPS T-2A page 6 line 93	14,072,713	24,560,663	38,293,098	53,680,923	62,704,212	
(pp) First-Class flats - Transportation cost per piece	USPS T-2A page 7 line 141	\$ 0.00083	\$ 0.00082	\$ 0.00079	\$ 0.00057	\$ 0.00049	
(qq) Total First-Class flats letter transportation costs	=(oo) * (pp)	\$ 11,717	\$ 20,198	\$ 30,118	\$ 30,540	\$ 30,968	
(rr) Standard Mail (A) Letters	USPS T-2A page 6 line 94	172,640,919	301,304,758	469,771,207	658,545,628	769,241,332	
(ss) Standard Mail (A) Letters - Transportation cost per piece	USPS T-2A page 7 line 142	\$ 0.00120	\$ 0.00119	\$ 0.00114	\$ 0.00082	\$ 0.00071	
(tt) Total Standard Mail (A) letter transportation costs	=(rr) * (ss)	\$ 207,925	\$ 358,421	\$ 534,470	\$ 541,952	\$ 549,540	
(uu) Standard Mail (A) flats	USPS T-2A page 6 line 95	31,279,247	54,590,685	85,113,598	119,315,929	139,371,882	
(vv) Standard Mail (A) flats - Transportation cost per piece	USPS T-2A page 7 line 143	\$ 0.01586	\$ 0.01567	\$ 0.01498	\$ 0.01084	\$ 0.00941	
(xx) Total Standard Mail (A) flat transportation costs	=(uu) * (vv)	\$ 496,104	\$ 855,185	\$ 1,275,231	\$ 1,293,084	\$ 1,311,188	
(yy) <u>Total Transportation Costs</u>	=(nn) + (qq) + (tt) + (xx)	\$ 758,340	\$ 1,307,227	\$ 1,949,306	\$ 1,976,596	\$ 2,004,269	
(zz) <u>Total Printing and Transportation Costs</u>	=(h) + (y) + (kk) + (yy)	\$ 58,017,203	\$ 101,763,749	\$ 156,946,957	\$ 218,909,433	\$ 262,138,113	
(aaa) 25% Markup on printing and transportation costs	=(zz) * 25%	\$ 14,504,301	\$ 25,440,937	\$ 39,236,739	\$ 54,727,358	\$ 65,534,528	
(bbb) <u>Total Revenue including Markup</u>	=(zz) + (aaa)	\$ 72,521,503	\$ 127,204,686	\$ 196,183,696	\$ 273,636,792	\$ 327,672,641	

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-17. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that the envelope cost for "Letter Size Pieces" is \$108,308. If you do not confirm, please explain.
- b. For 1999, please confirm that the price of a No. 10 envelope, with a logo and no window, is \$0.027248. See USPS-T-2. Exhibit A, Table 16, at 28. If you do not confirm, please explain.
- c. For 1999, please confirm that the envelope cost for "Letter Size Pieces" is \$7,087,110 (260,096,523x\$0.027248). If you do not confirm, please explain.
- d. For 1999, please confirm that the price of a No. 10 envelope, with a logo and no window, as shown in Exhibit B would be \$0.000416416. (\$108,308/260,096,523). If you do not confirm, please explain.
- e. Please show the derivation of the price of a No. 10 envelope, with a logo and no window, referred to in part (d) of this interrogatory.

OCA/USPS-T5-17 Response.

- a. Not confirmed. My revised Exhibit B, attached to my response to OCA-T5-16, includes 1999 envelope costs for letter-sized pieces of \$6,820,530.
- b. Confirmed.
- c. Not confirmed. My revised Exhibit B includes 1999 envelope costs for letter sized pieces of \$6,820,530 (250,313,062 letter-sized pieces at \$0.0272 per envelope).
- d-e. Confirmed, but the envelope cost and the number of letter sized pieces used in Exhibit B as filed were incorrect. See response to part (c).

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-18. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that the envelope cost for "Flat Size Pieces" is \$1,672,832. If you do not confirm, please explain.
- b. For 1999, please confirm that the price of a flat-sized (9x12) envelope, with a logo and no window, is \$0.0677976. See USPS-T-2, Exhibit A, Table 16 at 28. If you do not confirm, please explain.
- c. For 1999, please confirm that the envelope cost for "Flat Size Pieces" is \$2,409,455 (35,538,936x\$0.0677976). If you do not confirm, please explain.
- d. For 1999, please confirm that the price of a flat-sized (9x12) envelope, with a logo and no window, as shown in Exhibit B would be \$0.0470704. (\$1,672,832/35,538,936). If you do not confirm, please explain.'
- e. Please show the derivation of the price of a flat-sized (9x12) envelope, with a logo and no window, referred to in part (d) of this interrogatory.

OCA/USPS-T5-18 Response.

- a. Not confirmed. See my revised Exhibit B, attached to my response to OCA-T5-16, which includes a 1999 envelope cost for flat-sized pieces of \$2,122,000.
- b. Confirmed.
- c. Not confirmed. My revised Exhibit B includes 1999 envelope costs for flat-sized pieces of \$2,122,000 (45,351,960 flat-sized pieces at \$0.0468 per envelope). The envelope used was assumed to be a flat envelope (9x12") with no window and no logo.
- d-e. Confirmed, however the envelope cost and the number of flat-sized pieces used in Exhibit B as filed were incorrect. See response to part (c).

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-19. Please refer to USPS-T-5, Exhibit B.

- a. Please confirm that the "Total Cost" for envelopes is \$1,781,140. If you do not confirm, please explain.
- b. Please confirm that the "Total Cost" for envelopes should be \$9,496,565. (\$7,087,110+\$2,409,455). If you do not confirm, please explain.

OCA/USPS-T5-19 Response.

a-b. Not confirmed. My revised Exhibit B, attached to my response to OCA-T5-16, includes a total cost for envelopes of \$8,942,530 (\$6,820,530 for letter-sized envelopes plus \$2,122,000 for flat-sized envelopes).

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-20. Please refer to USPS-T-5, Exhibit A. Please confirm that prices shown in Exhibit A are "Sample Mailing Online Prices" for the year 1999. If you do not confirm, please explain.

OCA/USPS-T5-20 Response.

Confirmed.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-21. Please refer to USPS-T-5, Exhibit A, and the column "Envelope Costs."

- a. Please confirm that the envelope costs for a 2 Page, 8.5x11, Simplex, Black & White, First-Class mail piece, and a 5 Page, 8.5x11, Simplex, Spot Color, Standard (A) mail piece is \$0.000. If you do not confirm, please explain.
- b. Please confirm that the envelope costs for a 2 Page, 8.5x11, Simplex, Black & White, First-Class mail piece, and a 5 page, 8.5x11, Simplex, Spot Color, Standard (A) mail piece, should be \$0.027248. If you do not confirm, please explain.

OCA/USPS-T5-21 Response.

- a. Not confirmed. See my revised Exhibit A, which is attached, with documentation. An electronic version of the revised Exhibit A is being filed in library reference MC98-1/8.
- b. Confirmed.

Exhibit A
Sample Mailing Online Prices - 1999

Revised August 10, 1998

	Impression Costs (A)	Paper Costs (B)	Envelope Costs (C)	Transportation Costs (D)	Subtotal (E)	Contribution (F) = (E) * 0.25	Fee (G) = (E) * 1.25	Postage (H)	Total Postage & Fee (I) = (G) + (H)
<u>Example 1</u> 2 Page, 8.5x11, Simplex, Black & White, First-Class	\$ 0.0322	\$ 0.0098	\$ 0.0272	\$ 0.0005	\$ 0.0698	\$ 0.0174	\$ 0.0872	\$ 0.2700	\$ 0.3572
<u>Example 2</u> 10 Page, 8.5x14, Duplex, Black & White, First-Class	\$ 0.3218	\$ 0.0534	\$ 0.0468	\$ 0.0008	\$ 0.4228	\$ 0.1057	\$ 0.5285	\$ 0.7400	\$ 1.2685
<u>Example 3</u> 5 Page, 8.5x11, Simplex, Spot Color, Standard (A)	\$ 0.1280	\$ 0.0244	\$ 0.0272	\$ 0.0012	\$ 0.1809	\$ 0.0452	\$ 0.2261	\$ 0.2190	\$ 0.4451
<u>Example 4</u> 22 Page, 8.5x14, Duplex, Spot Color, First-Class	\$ 1.1262	\$ 0.1174	\$ 0.0468	\$ 0.0008	\$ 1.2912	\$ 0.3228	\$ 1.6140	\$ 1.4000	\$ 3.0140

Detailed Calculation of Costs for Exhibit A, Example 1

2 Page, 8.5x11, Simplex, Black & White, First-Class

Source	Description		
(A) Impression Costs			
(a) USPS T-2, Exhibit A, page 2 line 34	Total Impression Cost, 8.5x11, Black & White	\$ 0.0165	
(b) USPS T-2, Exhibit A, page 2 line 33	Information Systems - Fixed	\$ 0.0004	
(c) =(a) - (b)	Total Impression Cost excl. Fixed Info. Systems Costs	\$ 0.0161	
(d)	Number of Impressions	2	
(e) =(c) * (d)	Total Impression Costs	\$ 0.0322	
(B) Paper Costs			
(f) USPS T-2, Exhibit A, page 28	8.5 x 11 Paper Cost per sheet	\$ 0.0049	
(g)	Number of Sheets	2	
(h) =(f) * (g)	Total Paper Costs	\$ 0.0098	
(C) Envelope Costs			
(i) USPS T-2, Exhibit A, page 28	# 10 Envelope - No window and logo	\$ 0.0272	
(D) Transportation Costs			
(j) USPS T-2, Exhibit A, page 7, line 140	First-Class letter transportation costs	\$ 0.0005	
(E) Subtotal			
(k) =(e) + (h) + (i) + (j)		\$ 0.0698	
(F) Contribution			
(l)	Markup	25%	
(m) =(k) * (l)	Contribution	\$ 0.0174	
(G) Total Fee			
(n) =(k) + (m)		\$ 0.0872	
(H) Postage			
(o)	Weight per 8x11 sheet of paper (ounces)	0.2	
(p)	Number of sheets	2	
(q) =(o) * (p)	Total paper weight (ounces)	0.4	
(r)	Weight per #10 envelope (ounces)	0.2	
(s) =(q) + (r)	Total mail piece weight (ounces)	0.6	
(t) =roundup[(s),1]	Number of postage ounces	1.0	
		Rate	
(u) R97-1 rates eff. 1/10/99	First ounce automation basic presort rate letters	\$ 0.2700	
(v) R97-1 rates eff. 1/10/99	Additional ounce automation basic presort rate letters	\$ 0.2200	
(w) =(u) + [(t) - 1] * (v)	Total Postage	\$ 0.2700	
(x) =(n) + (w)	(I) Total Postage and Fees	<u>\$ 0.3572</u>	

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Detailed Calculation of Costs for Exhibit A, Example 2

10 Page, 8.5x14, Duplex, Black & White, First-Class

Source	Description		
(A) Impression Costs			
(a) USPS T-2, Exhibit A, page 2 line 34	Total Impression Cost, 8.5x14, Black & White	\$ 0.0165	
(b) USPS T-2, Exhibit A, page 2 line 33	Information Systems - Fixed	\$ 0.0004	
(c) = (a) - (b)	Total Impression Cost excl. Fixed Info. Systems Costs	\$ 0.0161	
(d)	Number of Impressions	20	
(e) = (c) * (d)	Total Impression Costs	\$ 0.3218	
(B) Paper Costs			
(f) USPS T-2, Exhibit A, page 28	8.5 x 14 Paper Cost per sheet	\$ 0.0053	
(g)	Number of Sheets	10	
(h) = (f) * (g)	Total Paper Costs	\$ 0.0534	
(C) Envelope Costs			
(i) USPS T-2, Exhibit A, page 28	Flat Envelope - no window no logo	\$ 0.0488	
(D) Transportation Costs			
(j) USPS T-2, Exhibit A, page 7, line 141	First-Class flats transportation costs	\$ 0.0008	
(E) Subtotal			
(k) = (e) + (h) + (i) + (j)		\$ 0.4228	
(F) Contribution			
(l)	Markup	25%	
(m) = (k) * (l)	Contribution	\$ 0.1057	
(G) Total Fee			
(n) = (k) + (m)		\$ 0.5285	
(H) Postage			
(o)	Weight per 8x14 sheet of paper (ounces)	0.254	
(p)	Number of sheets	10	
(q) = (o) * (p)	Total paper weight	2.54	
(r)	Weight per flat envelope (ounces)	0.4	
(s) = (q) + (r)	Total mail piece weight	2.94	
(t) = roundup((s), 1)	Number of postage ounces	3.0	
(I) Postage Rates			
(u) R97-1 rates eff. 1/10/99	First ounce automation basic presort rate flats	Rate \$ 0.3000	
(v) R97-1 rates eff. 1/10/99	Additional ounce automation basic presort rate flats	\$ 0.2200	
(w) = (u) + [(t) - 1] * (v)	Total Postage	\$ 0.7400	
(x) = (n) + (w)	(I) Total Postage and Fees	\$ 1.2685	

Detailed Calculation of Costs for Exhibit A, Example 3

5 Page, 8.5x11, Simplex, Spot Color, Standard (A)

Source	Description		
(A) Impression Costs			
(a) USPS T-2, Exhibit A, page 2 line 52	Total Impression Cost, 8.5x11 Spot Color	\$ 0.0260	
(b) USPS T-2, Exhibit A, page 2 line 51	Information Systems - Fixed	\$ 0.0004	
(c) =(a) - (b)	Total Impression Cost excl. Fixed Info. Systems Costs	\$ 0.0256	
(d)	Number of Impressions	5	
(e) =(c) * (d)	Total Impression Costs	\$ 0.1280	
(B) Paper Costs			
(f) USPS T-2, Exhibit A, page 28	8.5 x 11 Paper Cost per sheet	\$ 0.0049	
(g)	Number of Sheets	5	
(h) =(f) * (g)	Total Paper Costs	\$ 0.0244	
(C) Envelope Costs			
(i) USPS T-2, Exhibit A, page 28	# 10 Envelope - No window and logo	\$ 0.0272	
(D) Transportation Costs			
(j) USPS T-2, Exhibit A, page 7, line 142	Standard Mail (A) Letters	\$ 0.0012	
(E) Subtotal			
(k) =(e) + (h) + (i) + (j)		\$ 0.1809	
(F) Contribution			
(l)	Markup	25%	
(m) =(k) * (l)	Contribution	\$ 0.0452	
(G) Total Fee			
(n) =(k) + (m)		\$ 0.2261	
(H) Postage			
(o)	Weight per 8x11 sheet of paper (ounces)	0.2	
(p)	Number of sheets	5	
(q) =(o) * (p)	Total paper weight	1.0	
(r)	Weight per #10 envelope (ounces)	0.2	
(s) =(q) + (r)	Total mail piece weight	1.2	
(t) =roundup[(s),1]	Number of postage ounces	2.0	
	Rate		
(u) R97-1 rates eff. 1/10/99	Standard (A) Letter Size Basic Piece rate	\$ 0.2350	
(v) R97-1 rates eff. 1/10/99	Destination Entry Discount - BMC	\$ 0.0160	
(w) =(u) - (v)	Total Postage	\$ 0.2190	
(x) =(n) + (w)	(I) Total Postage and Fees	\$ 0.4451	

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Detailed Calculation of Costs for Exhibit A, Example 4

22 Page, 8.5x14, Duplex, Spot color, First-Class

Source	Description		
(A) Impression Costs			
(a) USPS T-2, Exhibit A, page 2 line 52	Total Impression Cost, 8.5x14 Spot Color	\$ 0.0260	
(b) USPS T-2, Exhibit A, page 2 line 33	Information Systems - Fixed	\$ 0.0004	
(c) =(a) - (b)	Total Impression Cost excl. Fixed Info. Systems Costs	\$ 0.0256	
(d)	Number of Impressions	44	
(e) =(c) * (d)	Total Impression Costs	\$ 1.1262	
(B) Paper Costs			
(f) USPS T-2, Exhibit A, page 28	8.5 x 14 Paper Cost per sheet	\$ 0.0053	
(g)	Number of Sheets	22	
(h) =(f) * (g)	Total Paper Costs	\$ 0.1174	
(C) Envelope Costs			
(i) USPS T-2, Exhibit A, page 28	Flat Envelope - No window and no logo	\$ 0.0468	
(D) Transportation Costs			
(j) USPS T-2, Exhibit A, page 7, line 141	First-Class flat transportation costs	\$ 0.0008	
(E) Subtotal			
(k) =(e) + (h) + (i) + (j)		\$ 1.2912	
(F) Contribution			
(l)	Markup	25%	
(m) =(k) * (l)	Contribution	\$ 0.3228	
(G) Total Fee			
(n) =(k) + (m)		\$ 1.6140	
(H) Postage			
(o)	Weight per 8x14sheet of paper (ounces)	0.254	
(p)	Number of sheets	22	
(q) =(o) * (p)	Total paper weight	5.588	
(r)	Weight per Flat envelope (ounces)	0.4	
(s) =(q) + (r)	Total mail piece weight	5.988	
(t) =roundup[(s),1]	Number of postage ounces	6.0	
	Rate		
(u) R97-1 Automation basic presort	First ounce rate flats	\$ 0.3000	
(v) R97-1 Automation basic presort	Additional ounce rate flats	\$ 0.2200	
(w) =(u) + [(t) - 1] * (v)	Total Postage	\$ 1.4000	
(x) =(n) + (w)	(I) Total Postage and Fees	\$ 3.0140	

ATTACHMENT TO
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PAGE 5 OF 5

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-22. Please refer to USPS-T-5, Exhibit A, and the column "Envelope Costs."

- a. Please confirm that the envelope costs for a 10 Page, 8.5x14, Duplex, Black & White, First-Class mail piece, and a 22 Page, 8.5x14, Duplex, Spot color, First-Class mail piece, is \$0.04499. If you do not confirm, please explain.
- b. Please explain the rationale for using the "Base - 1998" price of \$0.04499 for a flat-sized (9x12) envelope, with no logo and no window in Exhibit A, when Exhibit B uses the "Prices - 1999" of \$0.0677976 for a flat-sized (9x12) envelope, with a logo and no window.
- c. Please confirm that the envelope costs for a 10 Page, 8.5x14, Duplex, Black & White, First-Class mail piece, and a 22 Page, 8.5x14, Duplex, Spot color, First-Class mail piece, should be \$0.0467896. If you do not confirm, please explain.

OCA/USPS-T5-22 Response.

- a. Not confirmed. See my revised Exhibit A, attached to my response to OCA-T5-21, which includes envelope costs of \$0.0468 (Flat, 9x12", envelope with no window and no logo).
- b. The 1998 envelope price was used inadvertently. See part (a).
- c. Confirmed, if a flat envelope with no window and no logo is used. See my revised Exhibit A.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-23. Please refer to USPS-T-5, Exhibit A, "Example 2," "Postage" column. The First-Class postage for a 10-page document as \$0.74.

- a. Please explain how this postage figure was calculated.
- b. Assuming that the piece weighs 3 ounces, please confirm that the postage *should* be calculated by adding a 1-ounce automation-presort rate of 27 cents to 44 cents for an additional 2 ounces (2 x 22 cents). If you do not confirm, please explain.
- c. If you did assume that such a piece would weigh 3 ounces, how was it determined that this was an accurate assumption? Please set forth the formula used to estimate the weights of pieces considered in Exhibit A.

OCA/USPS-T5-23 Response.

- a. The postage was calculated for a three ounce, automation basic presort, First-Class flat mail piece using the Postal Rate Commission's R97-1 recommended rates. [PRC Op., R97-1, Vol. 1, Appendix 1 at 3.]

Automation Basic Presort Flat

First Ounce - Basic Presort	30.0 cents
Additional Ounces (2 at 22.0 cents)	<u>44.0 cents</u>
Total Postage	74.0 cents

- b. Not confirmed. See response to a.
- c. For the purposes of estimating the weight of the indicated 10 page document and envelope, the assumptions stated in Exhibit D, Note 4 of my testimony were used.

8.5x14 paper - 10 sheets at 0.254 oz. each	2.54 ounces
Flat envelope - 1 envelope at 0.4 oz. each	<u>0.4 ounces</u>
Total weight	2.94 ounces

DECLARATION

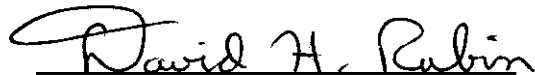
I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


MICHAEL K. PLUNKETT

Dated: August 10, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
August 10, 1998